

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CASE NO. 13-CR-217 (PAM/TNL)

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
v. )  
)  
GARY RICHARD VIBBARD, )  
)  
Defendant. )

**MOTION FOR LEAVE TO  
TRAVEL**

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The Defendant, Gary R. Vibbard, by and through his attorney, Charles L. Hawkins, hereby moves the Court for and Order granting Mr. Vibbard leave to travel from Leesburg, Florida to Portland, Oregon on December 21, 2013 to December 25, 2013 and from Leesburg, Florida to Myrtle Beach, South Carolina on December 31, 2013 to January 4, 2014.

This motion is based on the records and files in the above-entitled matter, any and all matters presented prior to or at the time of hearing said motion and following:

1. As a condition of Defendant's pretrial release, his travel is restricted to the Middle District of Florida and the District of Minnesota for court appearances, court related matters and appointments with counsel.

2. Mr. Vibbard seeks to travel to Portland, Oregon from December 21, 2013 to December 25, 2013 for the purpose of spending Christmas with Melissa Martin (his significant other) and her family in Portland, Oregon.
3. Defendant also wishes to drive to Myrtle Beach, South Carolina on December 31, 2013 to visit his 87 year old aunt over New Years, returning to Leesburg, Florida on January 4, 2014.
4. Undersigned counsel has discussed this request with Mr. Vibbard's United States Pretrial Services Officer, Bryan Coomer. Mr. Coomer has authorized counsel to represent that he does not object to Mr. Vibbard's requested travel.

WHEREFORE, the Defendant respectfully requests permission to travel to Portland, Oregon between December 21, 2013 and December 25, 2013 and to Myrtle Beach, South Carolina between December 31, 2013 and Saturday January 4, 2014.

Dated: December 17, 2013

Respectfully submitted,

/s/Charles L. Hawkins  
Charles L. Hawkins  
150 S. 5th Street, Suite 3260  
Minneapolis, MN 55402  
(612) 339-6921  
Attorney No. 124369